



1 Plaintiffs and Counterclaim Defendants, through their undersigned counsel,  
2 hereby respond to the Application for Leave to Withdraw (Dkt. No. 199) and Ex  
3 Parte Application for Order Granting Defendant's Motion for Leave to Withdraw  
4 as Counsel , Or, In The Alternative, for An Order To Shorten Time and Advance  
5 The Hearing On Defendants' Motion For Leave To Withdraw As Counsel (Dkt.  
6 No. 200).

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9 Plaintiffs/Counterclaim Defendants have no objection to the *ex parte* motion  
10 to the extent that it seeks either a hearing on shortened time or a resolution of the  
11 motion without a hearing, as the Court pleases. Plaintiffs/Counterclaim Defendants  
12 also do not object if leave is granted for current counsel of record for Defendants/  
13 Counterclaimants to withdraw. However, this non-objection is conditioned upon  
14 replacement counsel appearing who are able to keep the current schedule which  
15 has a trial date in June, 2017. Both sides have worked hard to get the case ready  
16 and in light of the start-up companies that are involved, resolving the claims made  
17 against them earlier rather than later is very important to their financial well-being.  
18 Finally, plaintiffs have no objection to the Declaration of Kristopher Diulio,  
19 Esquire (counsel for Defendants/Counterclaimants) being filed under seal (as  
20 requested at Dkt. No. 198), if it contains nothing but confidential material that  
21 should be protected from disclosure under the ethics rules.  
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1 Dated: March 21, 2017

Respectfully submitted,

2 MARKHAM & READ

3  
4 By: /s/ John J. E. Markham, II

5 John J. E. Markham, II  
6 *Attorney for Plaintiffs and*  
7 *Counterclaim Defendants*  
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**CERTIFICATE OF SERVICE**

Commonwealth of Massachusetts ) ss,  
County of Suffolk. )

I am employed in the county and state aforesaid. I am over the age of 18 and not a party to the within action. My business address is One Commercial Wharf West, Boston, MA 02110

On March 21, 2017, I served the foregoing document described as:

**RESPONSE TO APPLICATION FOR LEAVE TO WITHDRAW (DKT. #199) AND TO EX PARTE APPLICATION FOR ORDER GRANTING DEFENDANT'S MOTION FOR LEAVE TO WITHDRAW AS COUNSEL (DKT. #200)**

**[X] BY ELECTRONIC MAIL via the ECF filing system on:**

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*Attorneys for Defendants Paul Pejman Edalat, Olivia Karpinski, Farah Barghi, Blue Torch Ventures, Inc., LIWA, N.A., Inc., Sentar Pharmaceuticals, Inc. and EFT Global Holdings, Inc.*

Executed on March 21, 2017, in Boston, Massachusetts.

I declare under penalty of perjury under the laws of United States and the State of California that the foregoing is true and correct.

/s/ Elizabeth Read  
Elizabeth Read